

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Bonner, Robert, Jr ,	:	Bankruptcy No.: 20-13470-pmm
	:	
Debtor.	:	CHAPTER 13
	:	
	:	<b>HEARING DATE: March 31, 2022</b>
	:	<b>HEARING TIME: 10:00a.m.</b>
	:	<b>HEARING PLACE: Courtroom No. 4</b>
	:	<b>The Gateway Building</b>
	:	<b>201 Penn Street</b>
	:	<b>Reading, PA 19601</b>

**AMENDED MOTION FOR MODIFICATION OF  
CHAPTER 13 PLAN AFTER CONFIRMATION**

AND NOW come the Debtor, Robert Bonner, Jr, (heretofore referred to as the “Debtor”), by and through her Attorney, Patrick J. Best, Esquire, of ARM Lawyers, respectfully moves this Honorable Court as follows:

1. On January 19, 2021, the Debtor filed a Second Amended Chapter 13 Plan with this Honorable Court. On February 25, 2021, this Honorable Court filed an Order Confirming the Debtor’s Second Amended Plan.

2. The Debtor intends on filing a Third Amended Chapter 13 Plan based upon the following events:

- a. Debtor’s income was impacted by the COVID 19 pandemic insofar as he had COVID and fell behind on his Chapter 13 Plan payments;
- b. Debtor moved to Arizona and his expenses increased;
- c. Debtor wishes to extend his Chapter 13 bankruptcy plan by an additional 24 months to allow him to better afford his plan payments.

3. In accordance with F.R.B.P 3015(g) this Honorable Court requires the filing of a Motion to Modify or Amend the Chapter 13 Plan in order to confirm the Third Amended Chapter 13 Plan with the Court.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court enter and Order confirming the Debtor's Third Amended Chapter 13 Plan.

Date: March 3, 2022

/s/ Patrick J. Best  
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